

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Case No. 1:20-cr-00623-JSR-1

V

WILLIE DENNIS

MOTION TO PERMIT LIMITED
APPEARANCE, *PRO HAC VICE*,
AND *PRO BONO*, ON BEHALF
OF THE DEFENDANT FOR
DEFENDANT'S MOTION FOR
COMPASSIONATE RELEASE

COMES NOW the undersigned, on behalf of the Defendant in this cause, and files this Motion To Permit Limited Appearance, *Pro Hac Vice*, and *Pro Bono*, and would state the following:

1. The undersigned is an active member of the Florida Bar, Florida Bar # 192303, and is an active member of the bar of the United States District Court, Northern District Of Florida.
2. The undersigned seeks to appear on behalf of the Defendant in this matter *pro bono*, solely with regards to legally assisting the Defendant in presenting to this Court the Defendant's *pro se* Motion For Sentence Reduction Under 18 U.S.C. Section 3582 (c)(1)(A) (Compassionate Release) which is attached hereto as Exhibit "A", consisting of a six (6) page Motion, along with a five (5) page "Inmate Request To Staff".
3. The Defendant represented himself at trial. However, per order of this Court, he is represented for criminal appellate purposes only by Attorney David Jason Cohen, a member of the New York Bar, and who graciously supports both of these Motions.
4. The Defendant has limited physical abilities, uncertain cognitive capacity, and an emotional state of mind that precludes him from presenting this matter to the Court objectively

I have also attached as Exhibit “B”, consisting of six (6) pages, a copy of some of the Defendant’s medical records he forwarded to me in reference to his medical condition as of November 30, 2023.

5. The undersigned is prepared to appear before the court with a 72-hour notice window to support this request in person, and would set forth as grounds therefor the three (3) page letter attached hereto as Exhibit “C” which was submitted on January 29, 2021, at defense counsel’s request, in support of leniency for the Defendant at the sentencing .

WHEREFORE the undersigned requests that the Motion To Appear Pro Hac Vice, and Pro Bono, be granted and that a hearing on the Defendant’s Motion For Compassionate Release be set, or that the court *sua sponte* grant the Defendant’s Motion For Compassionate Release immediately.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by e-mail to Attorney David Cohen, at david@cfblaw.com, and by USPS to AUSA Kushner at The Southern District of New York, U.S. Attorney Office, 1 St. Andrews Plaza, New York, NY 10007, this 15th day of February, 2024

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